

Dear Commissioners:

I am writing in response to NOI in ET Docket 03-104 regarding the issue of Broadband over Power Line Technology.

While I agree with the intent of the Commissioners to provide a competitive and alternate source of Internet access, I strongly believe there is more about BPL that we don't know than that which we do know.

The unbalanced nature of power lines and the frequencies proposed almost insure significant interference to all HF and low-VHF services active in a large radius around the BPL transmission lines. There appears to be no uniform standards proposed as to frequency and modulation type and we are thus likely to wind up with a patchwork of systems with different interference patterns in each system deployed. This would make reducing and troubleshooting interference problems a difficult and largely individual undertaking. It is my understanding that studies in Europe and Japan have shown interference to HF communications and that the Japanese government has said no to BPL.

While BPL has the potential to interfere with almost any radio service in the spectrum effected, I am writing from the perspective of an Amateur Radio licensee of over 40 years. Amateur Radio has proven itself a valuable resource time and time again in various emergency and public safety situations. The potential for BPL to significantly degrade Amateur communications appears to be real. I am active in the local RACES organization and we helped provide assistance to the local Police Dept as recently as 4 July 2003.

The FCC has promised to protect licensed users of the spectrum from interference. I do not see how the Commission can realistically keep this promise without significant objective testing of the proposed forms of BPL. Proof of non-interference to licensed users of the spectrum should be an absolute minimum first step to be accomplished before allowing this technology to be rolled out.

Enthusiasm for this new technology should not overpower the need for sound engineering analysis of it's problems, for once it is deployed it will be almost impossible to backtrack and undo its shortcomings.

Thank you for your time in this matter.

R. Bruce Moricca, MSEE, MD
Amateur Callsign N6RB
Newport Beach, CA